

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No.: 13-24199  
Kenneth R. Watson, Debtor : Chapter 13  
:   
Bank of America, N.A., :   
Movant :   
vs. :   
Kenneth R. Watson and :   
Ronda J. Winnecour, :   
Chapter 13 Trustee, :   
Respondents :

**DECLARATION**

AND NOW comes the Debtor, Kenneth R. Watson, by his counsel, Shawn N. Wright, Esquire, to state the following in response to the Notice of Mortgage Payment Change dated 11/01/2016 filed by Bank of America:

1. Debtor filed his Chapter 13 case on October 4, 2013.
2. Debtor is currently paying \$667.25 to Bank of America on his mortgage.
3. The Notice of Payment Change indicates a change to \$683.31.
4. Due to the fact that the payment increase is somewhat slight, no amended Chapter 13 Plan need be filed because the plan is sufficiently funded.

WHEREFORE, Debtor requests that no further action need be taken with the Notice of Mortgage Payment Change.

Attorney for Debtor

/s/Shawn N. Wright  
Shawn N. Wright, Esquire  
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UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No.: 06-21323  
Kenneth R. Watson, Debtor : Chapter 13  
:   
BAC Home Loans Servicing, :   
Movant :   
vs. :   
Kenneth R. Watson and :   
Ronda J. Winnecour, :   
Chapter 13 Trustee, :   
Respondents :

**CERTIFICATE OF SERVICE OF DECLARATION CONCERNING NOTICE OF  
MORTGAGE PAYMENT CHANGE**

I, the undersigned, certify that I served or caused to be served, on October 2, 2016 a copy of the Debtor's Declaration Concerning Notice of Payment Change upon each of the following persons and parties in interest at the addresses shown below:

SENT VIA ELECTRONIC NOTICE:  
Office of U.S. Trustee  
Office of the Chapter 13 Trustee

SENT VIA U.S. FIRST CLASS MAIL:  
Bank of America  
Attn: Kendrick Stribling, Bankruptcy Dept.  
16001 North Dallas Parkway  
Dallas, TX 75001

Attorney for Debtor

/s/Shawn N. Wright  
Shawn N. Wright, Esquire  
Attorney for Debtor  
4 West Manilla Avenue  
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